

Doc Code:

PTO/SB/21 (09-06)

Approved for use through 03/31/2007. OMB 0651-0031  
U.S. Patent and Trademark Office: U.S. DEPARTMENT OF COMMERCE

Under the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number.

**TRANSMITTAL  
FORM**

(to be used for all correspondence after initial filing)

Total Number of Pages in This Submission

Application Number

09/925,601

Filing Date

August 10, 2001

First Named Inventor

Shunichi HOSOYAMADA

Art Unit

2629

Examiner Name

D. Q. Dinh

Attorney Docket Number

N01280US

**ENCLOSURES (Check all that apply)**

- ☐ Fee Transmittal Form  
☐ Fee Attached  
☐ Amendment / Reply  
☐ After Final  
☐ Affidavits/declaration(s)  
☐ Extension of Time Request  
☐ Express Abandonment Request  
☐ Information Disclosure Statement  
☐ Certified Copy of Priority Document(s)  
☐ Reply to Missing Parts/  
Incomplete Application  
☐ Reply to Missing Parts under  
37 CFR 1.52 or 1.53

- ☐ Drawing(s)  
☐ Licensing-related Papers  
☐ Petition  
☐ Petition to Convert to a  
Provisional Application  
☐ Power of Attorney, Revocation  
Change of Correspondence Address  
☐ Terminal Disclaimer  
☐ Request for Refund  
☐ CD, Number of CD(s) \_\_\_\_\_  
☐ Landscape Table on CD

- ☐ After Allowance Communication  
to TC  
☐ Appeal Communication to Board  
of Appeals and Interferences  
☒ Appeal Communication to TC  
(Appeal Notice, Brief, Reply Brief)  
☐ Proprietary Information  
☐ Status Letter  
☐ Other Enclosure(s) (please  
identify below):

Remarks

**SIGNATURE OF APPLICANT, ATTORNEY, OR AGENT**Firm Name **McGinn Intellectual Property Law Group, PLLC**  
8321 Old Courthouse Road, Suite 200, Vienna, VA 22182-3817Signature *Frederick E. Cooperrider*Printed name **Frederick E. Cooperrider, Esq.**Date *March 23, 2007*Reg. No. **36,769****CERTIFICATE OF TRANSMISSION/MAILING**

I hereby certify that this correspondence is being facsimile transmitted to the USPTO or deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on the date shown below:

Signature

Typed or printed name

Date

This collection of information is required by 37 CFR 1.5. The information is required to obtain or retain a benefit by the public which is to file (and by the USPTO to process) an application. Confidentiality is governed by 35 U.S.C. 122 and 37 CFR 1.11 and 1.14. This collection is estimated to 2 hours to complete, including gathering, preparing, and submitting the completed application form to the USPTO. Time will vary depending upon the individual case. Any comments on the amount of time you require to complete this form and/or suggestions for reducing this burden, should be sent to the Chief Information Officer, U.S. Patent and Trademark Office, U.S. Department of Commerce, P.O. Box 1450, Alexandria, VA 22313-1450. DO NOT SEND FEES OR COMPLETED FORMS TO THIS ADDRESS. SEND TO: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

If you need assistance in completing the form, call 1-800-PTO-9199 and select option 2.



THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BOARD OF PATENT APPEALS AND INTERFERENCES

In re Application of

Shunichi HOSOYAMADA

Serial No.: 09/925,601

Group Art Unit: 2629

Filed: August 10, 2001

Examiner: Dinh, D. Q.

For: **METHOD AND CIRCUIT FOR DRIVING LIQUID CRYSTAL DISPLAY AND  
IMAGE DISPLAY DEVICE**

Commissioner of Patents  
Alexandria, VA 22313-1450

**APPELLANT'S REPLY BRIEF ON APPEAL**

Sir:

In accordance with 37 CFR § 41.41, Appellant submits this Reply Brief in response to the Examiner's Answer mailed on January 23, 2007. Since Appellant earlier filed corrected Appeal Briefs that account for the revised claim status as reflecting the allowed claims, this Reply Brief merely adds the following arguments to those of record in the Appeal Brief.

Appellant first notes that the Examiner's Answer contradicts itself relative to the status of claims 52-54, since claims 53 and 54 are listed in paragraph 1 on page 3 as being rejected but listed in paragraph 2 on page 7 as being allowed.

As now best understood from the Examiner's Answer, the rejection currently of record relies upon the AAPA architecture shown in Figure 12 of the present application. Rather than using one of the polarity patterns shown in Figures 13A through 16 in AAPA, the rejection is based upon actually substituting the polarity reversal pattern shown in Figures 13A/13B of

Moriyama. The motivation for making this modification is given as being the description at line 65 of column 7 through line 2 of column 8 of secondary reference Moriyama.

That is, as best understood, the Examiner considers that, if the polarity pattern shown in Figures 13A/13B of secondary reference Moriyama were to be used in AAPA, then the plain meaning of independent claim 1 would be satisfied and the motivation to substitute this polarity pattern would be that power consumption would be reduced to one half.

Appellant respectfully submits that this rejection fails to meet the initial burden of a *prima facie* rejection, both as failing to provide a proper motivation to modify primary reference AAPA and as failing to result in the claimed invention even if this modification were to be made. This failure shows up in at least the following deficiency.

Relative to satisfying the plain meaning of the language of independent claim 1, Appellant submits that the pattern shown in Figure 13A of Moriyama does indeed arguably show a polarity reversal pattern for lines 2/3, lines 4/5, and lines 6/7, where  $n$  equals 2. However, the polarity reversal pattern clearly fails to be satisfied for lines 1/2, lines 3/4, and lines 5/6.

Appellant submits that this satisfaction of the described polarity reversal pattern for only one half of the lines of the LCD display fails to satisfy the plain meaning of the language of the final claim limitation of independent claim 1, since this language clearly requires that the reversal occur for every line of the LCD, not for every other line.

Hence, turning to the clear language of the claim, in AAPA and/or Moriyamo, there is no teaching or suggestion of: "... reversing a polarity for every signal electrode in said liquid crystal display ....", as required by independent claim 1.

For this reason alone, even if primary reference AAPA were to be modified to substitute the polarity pattern shown in Figures 13A and 13B of Moriyama, the resultant combination

would still fail to satisfy the plain meaning of the claim language of independent claim 1.

Independent claims 7, 13, 25, 31, 37, 49, 50, and 51 has similar language.

Relative to independent claims 53 and 54, the polarity reversal pattern of Figures 13A and 13B of Moriyama clearly do not show a slanted orientation but, rather, would have to be considered as some type of a jagged vertical slant.

Second, relative to the urged modification of primary reference AAPA by secondary reference Moriyama, the Examiner alleges that substitution of the pattern of 13A/13B of this reference into AAPA would reduce power dissipation. To support this position, the Examiner points to line 67 of column 7 through line 2 of column 8.

Appellant submits that this power reduction is relative to the polarity pattern of the prior art described in Moriyama, and does not necessarily apply to any and all other LCD polarity distribution patterns. That is, as described at lines 19-23 of column 8 of Moriyama, the reduced power dissipation arises because the polarity is reduced every second line, rather than every line.

In order to allege that power dissipation would be reduced in AAPA patterns shown in 13A-16, the Examiner needs to justify that substitution of the Moriyama 2H pattern would similarly reduce power dissipation in AAPA. There is no attempt to make such justification in the rejection. Absent such showing of reduced power in AAPA, Appellant submits that there is no reasonable motivation to substitute the Moriyama polarity pattern into AAPA. Therefore, the rejection currently of record fails to meet the initial burden of a *prima facie* rejection.

## CONCLUSION

In view of the foregoing, Appellant submits that claims 1-18, 25-42, 49, 50, 53, and 54 are clearly and patentably distinct from the prior art of record and in condition for allowance, in addition to claims 19-24, 43-48, and 52, which are allowed. Thus, the Board is respectfully requested to remove the rejection for these claims.

Please charge any deficiencies and/or credit any overpayments necessary to enter this paper to Attorney's Deposit Account number 50-0481.

Respectfully submitted,

Dated: 3/23/07



Frederick E. Cooperrider  
Reg. No. 36,769

McGinn Intellectual Property Law Group, PLLC.  
8231 Old Courthouse Road, Suite 200  
Vienna, VA 22182-3817  
(703) 761-4100  
Customer Number: 21254